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MEMO ENDORSED

March 24, 2008

United States District Judge Leonard B. Sand
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 3-25-08**

Re: United States v. Hussein Karimi
06 - CR - 477 (LBS)

Dear Judge Sand:

I write regarding my client, Hussein Karimi. My request is for an extension of the discovery review schedule, for the reasons explained below.

At Mr. Karimi's initial appearance in the Southern District on December 14, 2007, your Honor set a discovery production schedule and March 26, 2008 for the defense to submit a letter to the Court regarding defense motions.

The government supplied discovery material to the defense on January 10, 17, and March 3, 2008, and has technically completed discovery, in that they have given us documents and other materials pursuant to Federal Rule of Criminal Procedure 16(a).

However, among the material supplied by the government is an external hard drive with thousands of phone calls recorded by the government of Romania, where my client was a resident until his arrest and eventual extradition from Austria. These phone calls are in various languages including Kurdish and Farsi. The government has offered to provide a "road map" of these calls to the defense.

Also among the material provided on March 3, 2008 are approximately ten computer discs that are encrypted in a software program that my office has to purchase in order to be able to open and view the material, which consists of information obtained from computers seized in Romania. We are making this purchase this week.

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Hon. Leonard B. Sand
March 24, 2008
Page 2 of 2

In view of the enormous amount of discovery material yet to be reviewed, I write to ask for an additional 60 days for discovery review. If your Honor grants this request, I will communicate to you about defense motions on May 26, 2008.

The government, through Assistant United States Attorneys David A. O'Neil and Anjan Sahni, consents to this request. If your Honor grants my request, you may wish to reschedule the April 9, 2008 conference for the week of June 9, 2008.

Very truly yours,



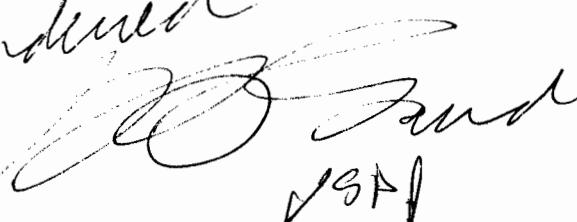
AVROM ROBIN

Cc: A.U.S.A. David A. O'Neil (via fax)
A.U.S.A. Anjan Sahni (via fax)

Endorsement

I am in an consent
The conference previously
scheduled for 4/9/2008 is rescheduled
for June 9, 2008 at 10: AM

So ordered



3/24/08

MEMO ENDORSED